

## **Exhibit 2**

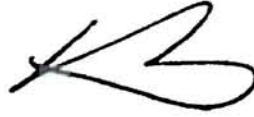
## **Declaration of Douglas Lung**

I, Douglas Lung, do hereby declare as follows:

1. I currently serve as Corporate Engineering Manager for NBC Telemundo. Prior to the merger of Telemundo with NBC in April 2002, I served as Vice President of Engineering for Telemundo. In that capacity, I became familiar with Station KPHZ(TV), Holbrook, Arizona (the "Station").
2. Telemundo's negotiations to acquire the Station from its prior licensee, Venture Technologies Group, LLC ("VTG"), commenced prior to the completion of the NBC/Telemundo merger. As Vice President of Engineering for Telemundo, I participated in the due diligence review of the Station on behalf of Telemundo. As part of the due diligence review, I examined the application filed by VTG for a digital construction permit for the Station. Because the Station did not exist at the time the FCC developed the digital Table of Allotments, it was not assigned a paired digital channel. Accordingly, the Station applied for and was granted a digital construction permit on its analog channel.
3. As part of that examination, I prepared a map using Longley-Rice to determine the actual coverage that would be provided by the Station's digital facility. That map, and a detailed section of that map showing the Phoenix area, are attached hereto as Attachment A. These maps show that only scattered small pockets of population in the area to the southwest of Phoenix will receive a 36 dBu signal from the digital facility and even fewer will receive a 43 dBu (city grade) signal. The digital signal will not reach Phoenix proper at all.
4. After the NBC/Telemundo merger was completed and during and after the acquisition of KPHZ by NBC Telemundo, I and other staff continued to examine alternatives for constructing a suitable digital facility for the Station. Due to concerns that it may not be feasible to construct the digital facility at the site specified by VTG because of pre-existing uses that may be incompatible with the construction of broadcast towers, we examined at least two other potential sites. The predicted coverage from these sites is depicted in the map attached hereto as Attachment B. The noise limited and city grade contours for the original site are shown in dark and light green. The noise limited and city grade contours of alternative site 1 are shown in red and magenta, respectively. The noise limited and city grade contours of alternative site 2 are shown in dark and light blue, respectively. This map shows that if the Station's digital facility were constructed at either of these sites, the digital coverage area would be located even further away from Phoenix than the currently specified site.
5. In connection with this rulemaking proceeding, I prepared the map attached hereto as Attachment C, which depicts the predicted Grade B contours of Stations KDRX-CA, KDTP and KTVW-TV. This map shows that the predicted Grade B contour of KDRX-CA does not reach communities to the southeast of Phoenix

with growing Hispanic populations, while the Grade B contours of both KDTP and KTVW-TV reach these communities.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 14th day of December 2004.

A handwritten signature in black ink, appearing to be 'DL' or 'Douglas Lung', written above a horizontal line.

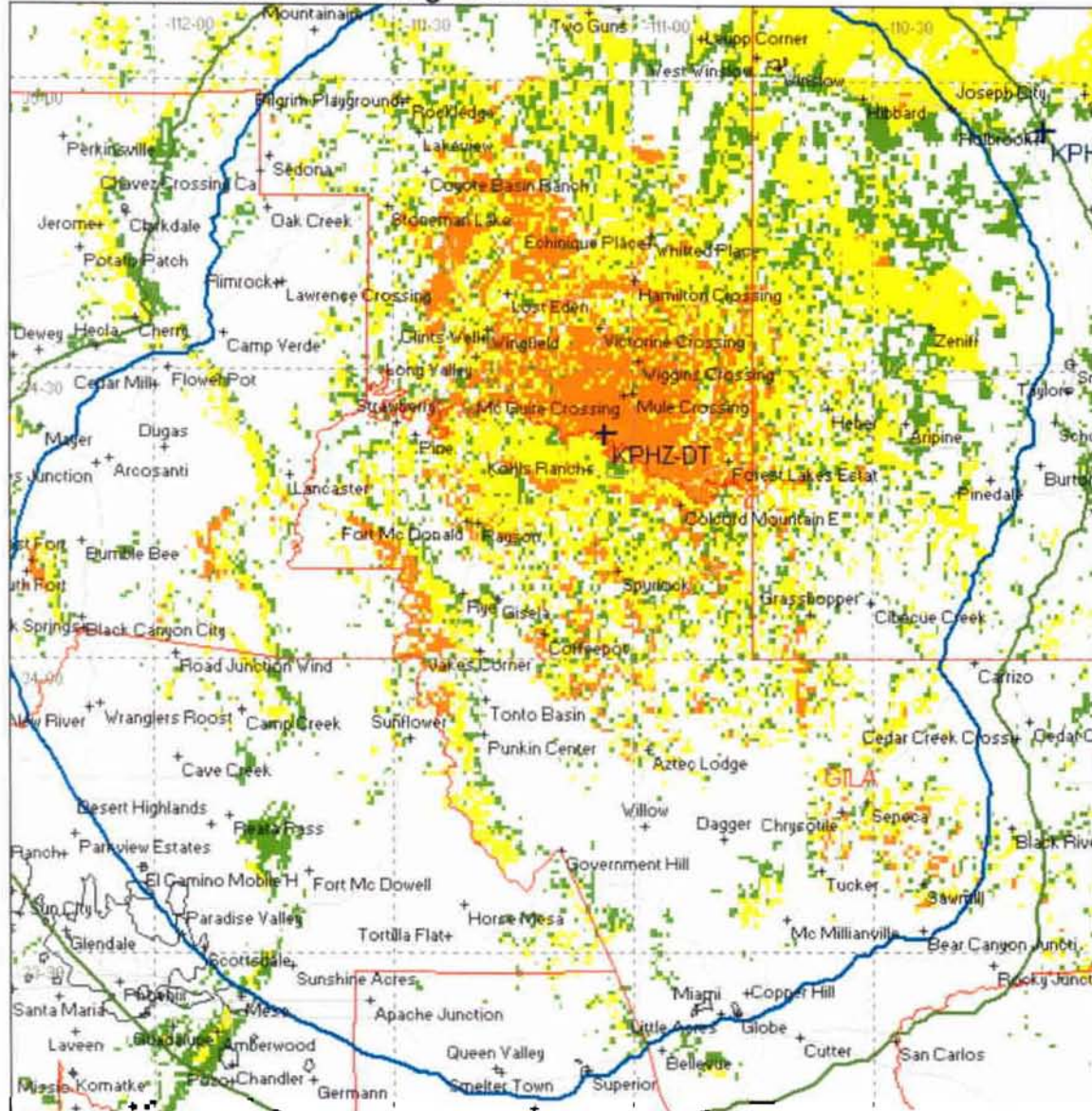
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Douglas Lung

## **Attachment A**



# KPHZ-DT Channel 11 Coverage as filed



## Legend:

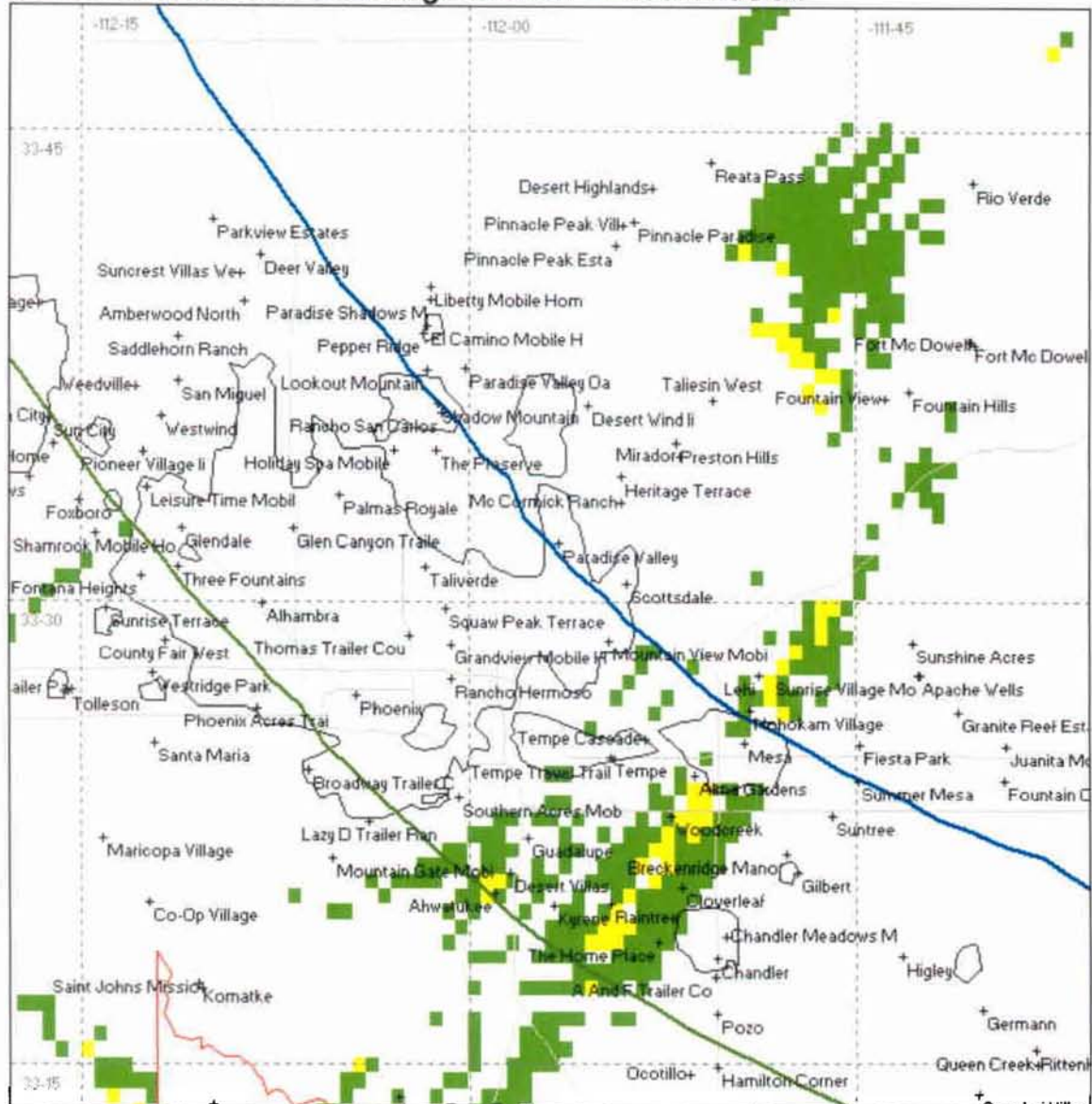
Green contour = 36 dBu/m  
Blue contour = 43 dBu/m ("City Grade")

## Signal Level (Longley-Rice OET-69, FCC defaults)

Green = 36 dBu/m or greater  
Yellow = 43 dBu/m or greater  
Orange = 60 dBu/m or greater (approximate level required by a cable headend)

Doug Lung March 18, 2002

# KPHZ-DT Channel 11 Coverage as filed – Phoenix detail



## Legend:

Green contour = 36 dBu/m  
Blue contour = 43 dBu/m ("City Grade")

## Signal Level (Longley-Rice OET-69, FCC defaults)

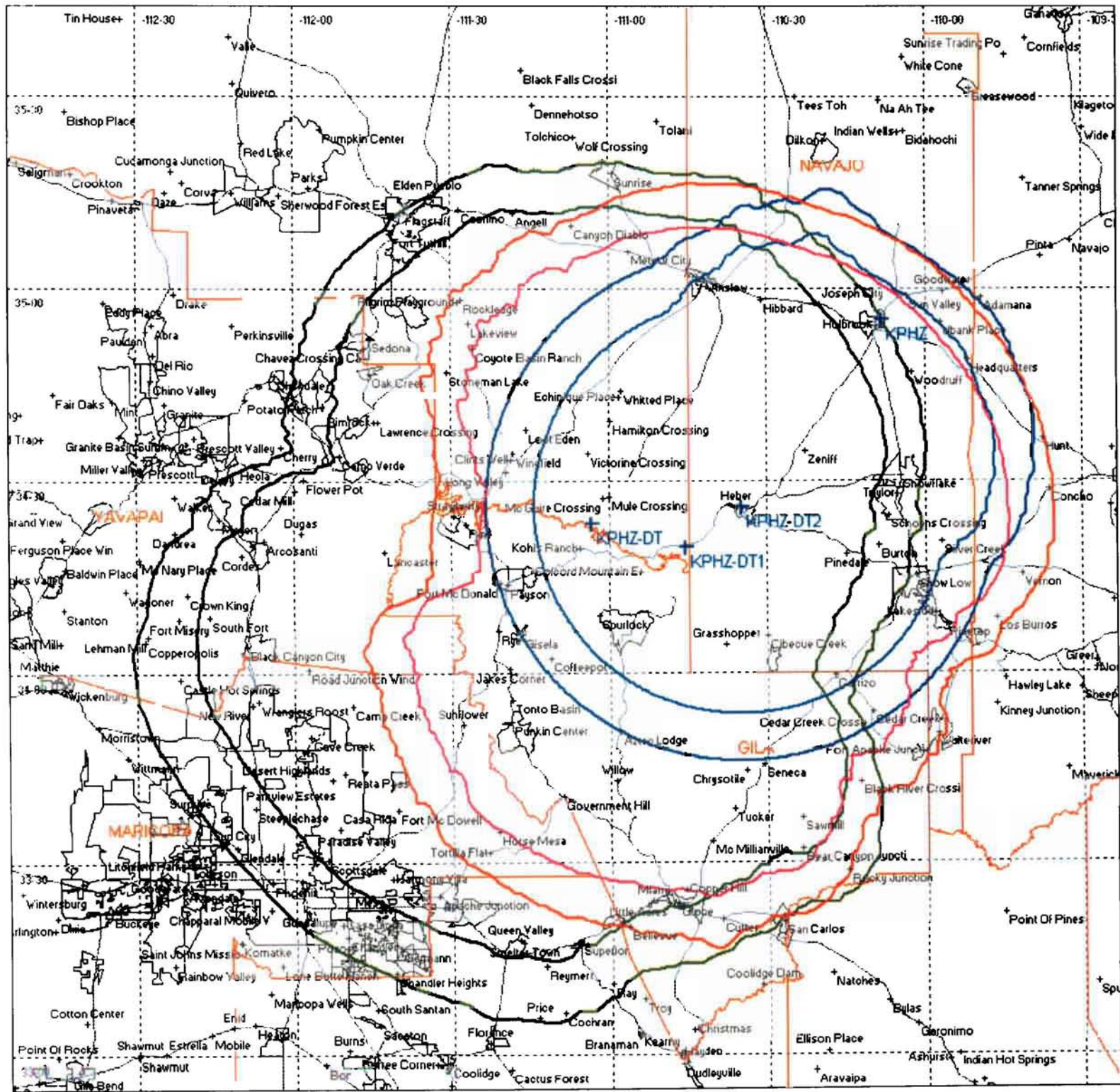
Green = 36 dBu/m or greater  
Yellow = 43 dBu/m or greater  
Orange = 60 dBu/m or greater (approximate level required by a cable headend)

Doug Lung March 18, 2002

## **Attachment B**



## Alternative Sites for KPHZ-DT

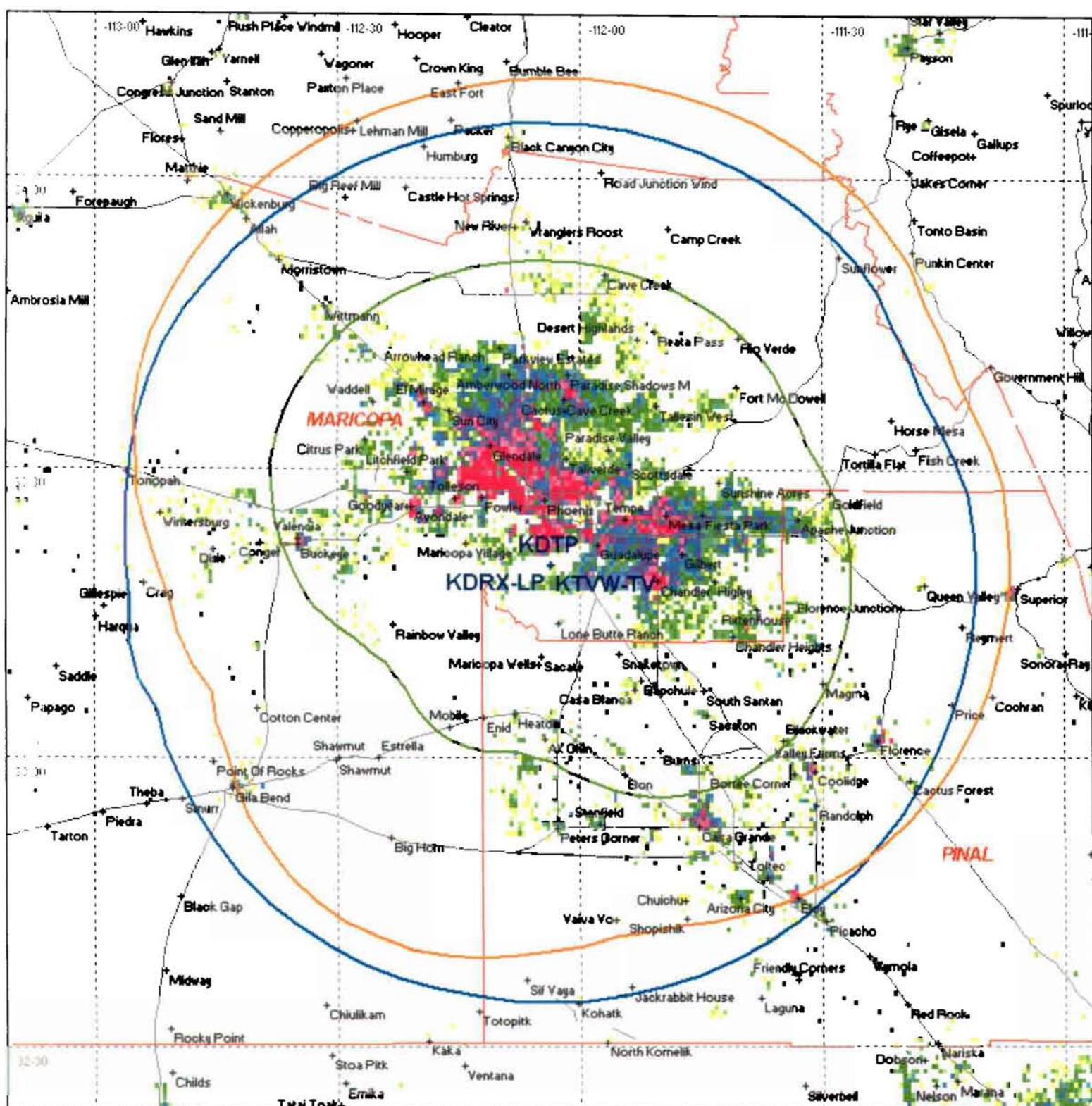




## **Attachment C**

# Predicted Grade B Contours of KDRX-CA, KTVW-TV and KDTP

KDRX-CA (green), KTVW-TV (orange), KDTP (blue)



*Hispanic Population Scale*

